

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20544**

In the Matter of	)	
	)	
Revitalization of the AM Radio Service	)	MB Docket No. 13-249
	)	

To: the Commission

**REPLY COMMENTS OF CHRISTIAN BROADCASTING SYSTEM, LTD**

Christian Broadcasting System, Ltd. ("CBSL") owns several AM stations, and serves local communities in Lexington, Kentucky, Flint, Michigan, Albany, New York, Lansing Michigan and Cincinnati, Ohio. CBSL hereby respectfully submits these reply comments in response to the comments submitted regarding the pre-sunrise and post-sunset operating power of AM stations.

As the Commission and many of the commenters have noted, AM radio service is in peril. There is a dire need for Commission intervention in order to save AM service in a way that will allow AM stations to fully serve their communities while protecting AM licensees from avoidable interference of their signals. To accomplish these goals, CBSL urges the Commission to (1) modify current rules to authorize AM stations to commence pre-sunrise operations at 5:00 a.m. local time, and (2) adopt blanket authorization of post-sunset services from local sunset to 7:00 p.m. local time.

**I. ADOPT BLANKET AUTHORIZATION FOR PRE-SUNRISE OPERATION FROM 5:00 A.M. TO LOCAL SUNRISE.**

In order to truly revive AM radio service, the Commission should adopt a blanket authorization for AM stations to operate with 500 Watts from 5:00 a.m. local time to local

sunrise for all classes of stations. This change in rules is necessary for AM stations to be competitive and economically viable in today's market. While the Commission is right to be concerned about the potential for interference to other AM licensees by the extension of pre-sunrise authority for AM stations, any interference would be minimal, while the benefits to AM stations would be dramatic.

The hours 5:00 a.m. to 9:00 a.m. are extremely important for AM stations as many listeners are traveling from home to work or school. Stations that are either off the air or operating at very low power between 5 a.m. and local sunrise are at an extreme disadvantage. They lose the listeners looking for essential early morning local content such as traffic reports, weather reports and local news. And, as noted in the comments of Richard F. Arsenault, for communities where AM stations are the only providers of local content, listeners can be left without any options for local content during their commute.

It is important that local service, rather than predicted interference, be the priority of the Commission. Authorizing pre-sunrise operations at 5:00 a.m. would have minimal consequences for competing licensees. The Commission already acknowledges this by allowing AM stations to operate during "experimental periods" from midnight to sunrise for routine testing.<sup>1</sup> During those experimental periods, AM stations can operate at their normal frequency as long as they do not cause interference with other stations maintaining a regular operating schedule during that period.<sup>2</sup>

Additionally, environmental noise levels are causing reception problems for most listeners of AM. The limit on pre-sunrise operating power is only making this situation worse.

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<sup>1</sup> See 47 CFR 73.72(a) (stating that AM stations can operate during experimental periods for "routine testing and maintenance of its transmitting system." )

<sup>2</sup> 47 CFR 73.72(b)

CBSL urges the Commission to serve the public and preserve AM service by allowing AM stations to operate at 500 Watts during the morning commute.

## **II. ADOPT BLANKET AUTHORIZATION FOR POST-SUNSET OPERATION FROM LOCAL SUNSET TIME TO 7:00 P.M.**

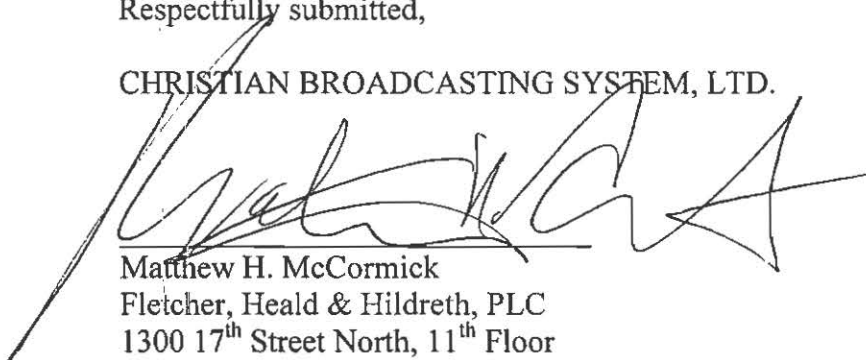
In addition supporting issuance of a blanket pre-sunrise authorization, CBSL urges the Commission to adopt a blanket authorization to permit AM stations to operate with at least 500 Watts from local sunset time to 7:00 p.m. for the months in which sunset occurs prior to 7:00 p.m. Much as in the case of pre-sunrise authority, this decision should be based on the need to provide local service to commuters. As mentioned in the comments of Randy D. Gelman, the original post-sunset authorizations were given to AM stations as a right, and they must be based solely on local service, rather than predicted interference.

## **CONCLUSION**

CBSL strives to provide the highest quality of AM service and content to its dedicated listeners. However, the extraordinary burdens placed on AM service put CBSL and many other AM licensees at a crippling competitive disadvantage during morning and evening drive-time. The Commission should take action to save AM service so that it can effectively serve the public and provide local content during important morning and early evening hours for AM listeners. To accomplish this task, CBSL urges the Commission to authorize all AM stations to (1) commence pre-sunrise operation with 500 Watts at 5:00 a.m., and (2) continue post-sunset operations from local sunset to 7:00 p.m.

Respectfully submitted,

CHRISTIAN BROADCASTING SYSTEM, LTD.



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